

Jordan, Sheron

From: _Regulatory Comments
Sent: Monday, August 28, 2006 7:17 AM
To: Jordan, Sheron
Subject: FW: Bill Briscoe Comments on Notice of Proposed Rule Making (Suspicious Activity Reports)

From: Bill Briscoe [mailto:whbriscoe@comcast.net]
Sent: Sunday, August 27, 2006 10:13 PM
To: _Regulatory Comments
Subject: Bill Briscoe Comments on Notice of Proposed Rule Making (Suspicious Activity Reports)

Dear Ms. Rupp:

It is unnecessary and inefficient to recodify the substantial portion of Treasury Department regulations at 31 CFR 103.18 as NCUA regulations at 12 CFR 748a. Credit unions have been subject to these Treasury regulations for many years and duplicating the language within the federal system serves no purpose and may even lead to confusion about applicability and importance. Only a small portion of the proposal is not a duplicate of 31 CFR 103.18.

Further, much of the proposed regulation (that which duplicates 31 CFR 103.18) appears to be in direct conflict with Executive Order 12866 issued by President Clinton and revised by President Bush. E.O. 12866, Section 1. (b)(10) states: "Each agency shall avoid regulations that are inconsistent, incompatible, or **duplicative** with its other regulations or those of other Federal agencies." (emphasis added)

Bill Briscoe
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